

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney

Title: Director

REQUEST: AT&T Communications of New England, Record Request

DATED: July 10, 2002

ITEM: RR – ATT-VZ 1 Please provide a copy of the M&P ("MMP") guidelines that an associate would use in filling out a report when a CLEC calls an 800 number and that an associate would use in classifying the type of incidents.

REPLY: See attached.

VZ RR # 1

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lynelle Reney

Title: Director

REQUEST: AT&T Communications of New England, Record Request

DATED: July 10, 2002

ITEM: RR – ATT-VZ 2 Please provide a copy of the industry notice dated July 2nd and sent to CLECs regarding a change in the procedure regarding access and ID cards.

REPLY: See attached industry notice, which was posted to the Verizon website and sent electronically to CLECs.

VZ RR # 2

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Peter Shepherd

Title: Director

REQUEST:

WorldCom Record Request

DATED:

July 10, 2002

ITEM: RR – WCOM-VZ 1

Please identify if there is a proceeding underway in both New York and New Jersey regarding collocation security or security of central offices. If so, please provide a copy of the Commission order establishing the investigation and the current status.

REPLY:

Verizon has confirmed the testimony given at the July 10th hearing (Tr. 119-25) that although there may be some informal discussions in New York or New Jersey, neither state commission has undertaken formal docketed proceedings regarding collocation security.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence Craft
Title: Manager

REQUEST: Allegiance, Record Request

DATED: July 10, 2002

ITEM: RR – AL-VZ 1 Please confirm Mr. Craft's understanding; and if in fact there are any risk assessments for central offices with E-911 tandems in Northampton, Wakefield, and Westborough, please provide them .

REPLY: No risk assessments are completed for any of the three offices listed above.

VZ RR # 4

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence Craft
Title: Manager

REQUEST: Allegiance, Record Request

DATED: July 10, 2002

ITEM: RR – AL-VZ 2 Please provide a copy of the deputy building coordinator security inspection reports for any COs that weren't already produced.

REPLY: Attached are Verizon's security inspection reports for two additional Massachusetts central offices that were not previously submitted in the Company's Reply to AL-VZ 2-1. These documents are highly proprietary, as stated in Verizon MA's Motion for Confidential Treatment dated June 26, 2002. Because of the confidential nature of the documents requested, Verizon MA provides such information to the Department only and to parties subject to the terms of a Protective Agreement.

VZ RR # 5

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence Craft
Title: Manager

REQUEST: Allegiance, Record Request

DATED: July 10, 2002

ITEM: RR – AL-VZ 3 (a) Please provide a list of any forms that show any deficiencies (b) Please provide a copy of the summary report for Massachusetts regarding deficiencies.

REPLY: (a) & (b) Information relating to Verizon's security inspection reports for its Massachusetts central offices ("CO") is highly proprietary, as stated in Verizon MA's Motion for Confidential Treatment dated June 26, 2002. Because of the confidential nature of the data requested, Verizon MA provides such information to the Department only and to parties subject to the terms of a Protective Agreement.

It should be noted this confidential summary contains Verizon CO and non-CO locations in Massachusetts. That summary has been redacted to exclude the names and contact numbers for building coordinators for all Massachusetts locations listed.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence Craft
Title: Manager

REQUEST: Allegiance, Record Request

DATED: July 10, 2002

ITEM: RR – AL-VZ 4 Provide copies of the Deputy Building Coordinator Security Inspection reports showing question #11 answers which were cut off in reproduction.

REPLY: Verizon MA will provide copies of the requested pages as soon as Allegiance identifies which pages are incomplete and require reproduction, as indicated at the hearings (Tr. 187-88).

VZ RR # 7

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Robert Jacobs

Title Director

Respondent: Lynelle Reney

Title: Director

REQUEST: Sprint, Record Request

DATED: July 10, 2002

ITEM: RR – Sprint-VZ 1 Please provide (a) a copy of the incident log that covers the missing Sprint router from the Revere central office, (approximately July 2000 timeframe?); and (b) what the disposition is of that investigation on the router.

REPLY: Verizon is not aware of and has no information relating to reports of a Sprint router missing from the Revere central office (“CO”) in the July 2000 time frame. However, it appears that a Sprint router was reported missing from the Revere CO on October 27, 2000. See Attachment A for a copy of the log or ticket issued by the Verizon Collocation Care Center (No. 001027-3905), and Attachment B for a copy of Verizon Security’s General Case incident report (GC-001747015). As stated in the “Conclusion” section of the Verizon Security Report, this matter was referred to the Revere Police Department.

Attachment B was included in Verizon MA’s Reply to AG-VZ 1-1. However, because Verizon Collocation Care Center (“CCC”) classified Sprint’s report of missing equipment as a cage violation, not a central office security breach, the CCC Help Desk Ticket was not included in Verizon MA’s original or supplemental Reply to AG-VZ 1.

VZ RR # 8

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Peter Shepherd

Title: Director

REQUEST: Department of Telecommunications and Energy, Record Request

DATED: July 11, 2002

ITEM: RR – DTE-VZ 1 Please provide for the last two years or for as long as C2C reports have been published, the monthly aggregate performance metrics for virtual collocation installations and augments.

REPLY: Virtual Collocation Network Performance results for new arrangements and augments are found in the Massachusetts C2C reports under the heading “NP-2-Collocation Performance” – specifically, NP-2-02 (“Percent On-Time Response to Requests for Virtual Collocation”), NP-2-04 (“Average Interval-Virtual Collocation”), NP-2-06 (“% On Time–Virtual Collocation”) and NP-2-08 (“Average Delay Days-Virtual Collocation”). Attached are copies of those monthly C2C reports that contain actual virtual collocation activity since the C2C report was filed in July 2000 to date.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Lawrence Craft

Title: Manager

REQUEST: Union, Record Request

DATED: July 11, 2002

ITEM: RR – IBEW-VZ 1 Please provide the list compiled for the 200 locations across the Verizon footprint that are deemed vital facilities that Verizon considered in conducting its risk assessment of vital facilities.

REPLY: Verizon MA objects to this request on the grounds that it is overly broad, seeks information that is irrelevant, immaterial and beyond the scope of this proceeding, and is not reasonably calculated to lead to the discovery of admissible evidence. Verizon MA further objects to this request because it seeks highly proprietary, commercially sensitive and security-related information on a central-office specific basis.

Without waiving these objections, Verizon MA responds to this request as follows:

Because of the confidential nature of the document requested and based on the scope of this investigation, Verizon MA identifies Massachusetts-only locations in alphabetical (not ranked) order, and provides this to the Department only on a proprietary basis. It should be noted that the list of 200 Company locations was not developed in connection with Verizon MA's collocation security proposal, and does not reflect or represent Verizon MA's recommendation of which Massachusetts locations should be designated as critical offices – and limited to virtual collocation arrangements only. As stated throughout this proceeding, if Verizon MA's proposal is adopted, that determination would be made by the Department.

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Peter Shepherd

Title: Director

REQUEST: Department of Telecommunications and Energy, Record Request

DATED: July 11, 2002

ITEM: RR – AL-VZ 5 Can you tell me what criteria are being applied in determining whether cleaning-crew members receive identification badges, how do you decide whether a particular employee gets an ID card and any documentation of any sort of process for determining how those ID cards are issued?

REPLY: See attached for Verizon's application forms and instructions regarding non-Company identification badges. See also Verizon MA's Supplemental Reply to AL-VZ 1-17.

Verizon requires that all employees, contractors and collocators must visibly wear their ID Cards whenever they are on company premises. Non-Employee ID Cards are issued to contractors and other non-employees who have a recurring business need to enter our buildings without escort. To obtain a non-employee ID card a vendor must submit a non-employee ID application for each employee who performs work in a Verizon MA facility. This includes both supervisory and cleaning crew personnel.

VZ RR # 11

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Robert Jacobs

Title: Director

Respondent: Lynelle Reney

Title: Director

REQUEST: Department of Telecommunications and Energy, Record Request

DATED: July 12, 2002

ITEM: RR – DTE-VZ 2 In reference to the security Summary reports provided in Verizon's initial and supplemental responses to AG 1-1 for the years Jan. 2000 to April 2002:

- a) Identify the Massachusetts incidents contained in the Summary Reports
- b) As listed in the resolution column, where the responsible party is determined by Verizon, identify if the responsible party is a
 - Verizon employee
 - Verizon contractor, affiliate, or vendor
 - Collocator (also if access privileges were terminated)
- c) Identify any incidents that appear in both the Security Summary Reports and the Collocation Care Center (CCC) Summary Reports

REPLY:

- a) The Massachusetts incidents in the attached summary reports are located under Director- Robert Jacobs and noted with a handwritten "X."
- b) Verizon has identified no responsible parties, and has referred these matters to law enforcement authorities, as appropriate.
- c) The following lists the duplicative reports:

<u>Security Report #</u>	<u>CCC Log or Ticket #</u>
00-03827-15	000-310-1861
00-17883-15	001-106-3978
01-01564-15	010129-4751
02-16774-13	020205-8392
02-16773-15	020205-8393

**Verizon New England Inc.
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Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Peter Shepherd

Title: Director

REQUEST: Department of Telecommunications and Energy, Record Request

DATED: July 12, 2002

ITEM: RR – DTE-VZ 3 Provide the following data that has been filed with the Department and the FCC:

- a) Verizon outage reports from January 1999 to present
- b) A narrative explanation of
 - ?? Nature of outage
 - ?? Number of impacted customers
 - ?? Cause of outage
 - ?? If identifiable, outage caused by
 - ~~EE~~ Verizon employee
 - ~~EE~~ Verizon contractor, affiliate, or vendor
 - ~~EE~~ Collocator
- c) Identify the minimum requirement to trigger an outage report
- d) The Department and FCC directives that established the outage reporting requirements

REPLY: a) Attachment 1 contains copies of the major service outage notification reports filed with the Department from January 1999 through May 2002 in compliance with the Department's Orders in D.P.U. 89-300, DPU 92-100, and DTE 96-30. . Attachment 2 contains copies of the FCC outage reports for Massachusetts for the period beginning January 1999 through June, 2002. Those reports are filed in accordance with FCC requirements as set forth in 47 C.F.R., Part 63.100 - Notification of Service Outage.

- b) The reports provided in Verizon MA's reply to (a) above include the requested narrative explanation

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REPLY: RR-DTE VZ 3
(cont'd):

- c-d) The following Department orders established the criteria for filing major service outage reports: D.P.U. 89-300 (June 29, 1990, Order, at 310, and Exhibit DPU-Q117, Sec. 2, page 16); D.P.U 92-100 (August 28, 1992, Order, at 72), requiring the Company's filing of "its major service outage reports at the same time that it files these reports with the FCC;" and D.T.E. 96-30A (April 2, 1998, Order, at 2), defining a major extended service outage ("MESO") as "a service interruption affecting at least 200 customers which lasts more than 48 hours." This is included as Attachment 3.

Part 63.100 of the FCC rules provide the conditions for filing service disruption reports. Those rules were first established by the FCC in its *Second Report and Order* in CC Docket 91-273, 9 FCC Rcd 3911 (1994), and later revised by the FCC's *Order on Reconsideration*, in CC Docket 91-273, 10 FCC Rcd 11764 (released October 30, 1995). Attachment 4 includes a copy of the FCC rules and the above FCC orders.

VZ RR # 13

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Peter Shepherd

Title: Director

REQUEST: Department of Telecommunications and Energy, Record Request

DATED: July 12, 2002

ITEM: RR – DTE-VZ 4 Provide the FCC central office space reservation rules.

REPLY: See the attached FCC Rules, 47 C.F.R, Part 51.323, pertaining to space reservation and assignment rules for physical and virtual collocation.

VZ RR # 14

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 02-8

Respondent: Robert Jacobs

Title: Director

REQUEST: Attorney General, Record Request

DATED: July 12, 2002

- ITEM:** RR – AG-VZ 1
- a) Are the Revere theft occurrences (identified in the Security Summary Reports as GC-0017470, 17883-15, 17945-15) related in anyway to the missing report alleged by the Sprint witness for an incident occurring in July 2000.
 - b) Provide any underlying investigative reports, including police reports, if any.
 - c) Also provide a detailed narrative of Verizon's investigatory efforts into the Revere incidents
 - d) Provide a detailed narrative of any changes made to the Revere CO as a result of these incidents
 - e) Did VZ run a search of Verizon-east database for instances at the Revere CO, whether or not they were related to CLECs or Collocators. Also, did VZ run a search for other incidents that occurred in the Revere CO.

- REPLY:**
- a) See Verizon MA's Reply to RR- Sprint VZ 1. Verizon Security Report CG-0017470 relates to the Sprint incident in the Revere CO. By contrast, CG-0017883-15 and CG-0017945-15 relate to a different incident involving a different carrier. The first number was generated by a report made directly by the carrier to the Verizon Security Department, and the latter number was generated as a result of a referral from the Verizon Collocation Care Center to Verizon Security regarding that same incident.

- b) Verizon has no such documents in its possession, custody or control.

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REPLY: RR-AG VZ 1:
(cont'd)

- c) The first incident (GC-0017470) was reported to Verizon Security on October 27, 2000, by the Verizon collocation manager. The collocator was also on the scene, and notified the Revere police department. The Verizon collocation manager also identified two Verizon employees who may have witnessed the thefts, and provided their names were provided to the police. The missing equipment was reportedly installed for Sprint on October 24, 2000. Verizon Security visited the location area and determined there was no sign of forced entry. Verizon Security also determined through the database that there were no previous incidents reported for this Revere, MA location.

The subsequent incident (GC-0017883, reported November 6, 2000, and GC-0017945, reported November 7, 2000) were duplicate cases for the theft of another carrier's equipment, as stated in Verizon MA's Reply to (a) above. The matter was reported to the Revere Police Department.

- d) Verizon Security concluded that these reports were a one-time theft involving two separate collocators' equipment. Therefore, no changes were made to the Revere CO as a result of these incidents described in Verizon MA's Reply to (b) above. Verizon Security's conclusions were based on the following procedures used in cases involving theft at a central office ("CO").

Verizon Security would first determine if that particular CO had previous thefts reported. A site visit may also take place to examine the lay-out of the collocator's area. Security would also attempt to determine the date and time of the alleged theft, any possible witnesses, and the description of the stolen materials (*e.g.*, serial number, make, model number, etc.). If Verizon Security determines that there is no evidence of a forced entry, the carrier would be advised to notify the local police. Verizon Security would provide further assistance to local authorities, as necessary.

- e) Verizon Security has conducted a database search, and no other incidents were reported in the Revere CO.

VZ RR # 15